



Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
P.O. Box 98608
Las Vegas, NV 89193-8608

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QA: N/A

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LICENSING SUPPORT SYSTEM (LSS) CONSIDERATIONS (SCP: N/A)

The current Quality Assurance Requirements and Description, Section 17, includes requirements for the classification of quality assurance (QA) records. These classifications are "Lifetime" and "Nonpermanent." These classifications are intended to differentiate between those nonpermanent records that demonstrate that a process is being implemented (such as document review sheets for document reviews), compared to those lifetime records that are produced by or are an outcome of a process (such as an approved procedure or design document). Further, audits are performed to assure that processes are controlled as documented on nonpermanent QA records and that lifetime QA records document the required information that will be used in licensing. Since the Office of Civilian Radioactive Waste Management has made this a requirement and there is now a sort between these two categories, it is time to reap the benefit when considering the population of records that need to be in the LSS.

The recommendation from the Office of Quality Assurance (OQA) is to only put lifetime QA records in the LSS system. This recommendation is based on the fact that nonpermanent QA records have never been required to license any previous facility. This recommendation can be implemented by taking advantage of the exclusions recognized by 10CFR2, Subpart J. This can be done by indicating these respective dispositions of QA records (Lifetime to be put in LSS and Nonpermanent not to be put in LSS) using the already required Records Inventory Disposition Schedule (RIDS) and submitting this to the U.S. Nuclear Regulatory Commission (NRC) for approval. Please note this approach does not include correspondence related to the project. Correspondence can be addressed separately in the RIDS. It includes all external and internal project-related correspondence which is normally handled by putting the appropriate U.S. Department of Energy records center on distribution for records capture. The only other records required for LSS are a smaller population that demonstrates compliance with other than NRC licensing quality assurance requirements. Following this approach, there are only three basic categories of documents for licensing and LSS: Lifetime QA Records, Correspondence, and Other.

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-2-

If you have any questions, please contact Catherine E. Hampton at 794-7973.



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